

REMARKS

The Examiner is thanked for the careful examination of the application. However, in view of the following remarks, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

The Examiner is also thanked for the interview conducted with applicant's representative on December 5, 2006. At the interview, the arguments set forth below were discussed with the Examiner.

The present application includes four rejections based on 35 U.S.C. §103(a). Each of the rejections relies on a "first reference" to teach the basic vacuum vessel with a partitioning section. For the four rejections, the "first reference" is Xu (USPP 2001/0042512), Ko (USP 6,427,623), Tanaka (USPP 2002/0152960), and Yuda (USP 6,663,715), respectively.

For each of the four rejections, the Examiner has added the teachings of Kasai (USP 6,436,193), Long (USPP 2003/0079983), and Loan (USP 6,296,711).

With regard to the rejections based on Ko and Tanaka, the Examiner is advised that those references are not prior art with respect to the present application under 35 U.S.C. §103(c), in that each of the present application and the two references are assigned to the same entity, Anelva Corporation.

With regard to the rejection set forth in paragraph 2 of the Official Action, i.e., based on Xu, the Examiner is advised that the apparatus disclosed therein does not teach or suggest that the partitioning plate is electrically grounded to the walls of the chamber. In fact, the partitioning plate in Xu is secured to the walls of the chamber through an insulating part 22. The partitioning plate in Xu is grounded through power supply rod 30. However, the applicant determined that such grounding was not

sufficient for certain applications. In some cases, unintended discharges occurred in the processing region. Accordingly, one of the features of the present invention is that the partitioning plate is grounded to the walls of the vacuum vessel to ensure adequate grounding.

Applicant submits that none of the references set forth in the rejection in paragraph 2, i.e., Xu, Kasai, Long, and Loan, teach or suggest grounding the partitioning plate to the chamber walls. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claims 1 and 3-10.

In addition, the Examiner has alleged that the motivation for modifying Xu with the heater disclosed by Kasai is to control the temperature of the processing gas to prevent condensation of the processing gas, or heat the processing gas to the desired temperature prior to the gas entering the processing vessel. However, in the preferred disclosed embodiment of Xu, the processing gas is silane, and there is no problem with the silane gas condensing. Accordingly, there would be no motivation to add a heater to the apparatus of Xu. Accordingly, applicant submits that the combination of Kasai with the remaining references is improper and should be withdrawn.

With regard to the rejection set forth in paragraph 5, based on Yuda, applicant submits that there is no teaching or suggestion in Yuda to ground a partitioning plate to the chamber walls. Accordingly, applicant submits that the rejection set forth in paragraph 5 should be withdrawn at least for the two reasons set forth above with respect to the rejection set forth in paragraph 2, based on Xu.

To further define the protection to which applicant is entitled, new claims 11-14 are submitted herewith. The new claims 11-14 depend from claims 1 and 3 and

are patentable over the applied prior art at least for the reasons set forth above with respect to claims 1 and 3.


In view of the foregoing remarks, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

In the event that there are any questions concerning this response, or the application in general, the Examiner is respectfully encouraged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

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